

1 THE HONORABLE JAMES L. ROBART
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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 PATRICK JACK and LESLIE JACK,) Case No. 2:17-cv-00537-JLR
11 husband and wife,)
12 Plaintiffs,)
13 v.)
14 ASBESTOS CORPORATION LTD, et al.,)
15 Defendants.)
16 **STIPULATION AND [PROPOSED]**
17 **ORDER FOR EXTENSION OF TIME**
18 **TO TAKE THE DEPOSITION OF**
19 **UNION PACIFIC RAILROAD**
20 **COMPANY'S CORPORATE**
21 **REPRESENTATIVE**

22 Counsel for Defendant Union Pacific Railroad Company ("Union Pacific") and counsel
23 for Plaintiffs Leslie Jack and David Jack ("Plaintiffs"), hereby stipulate to an extension of time
24 beyond the current discovery cutoff of June 18, 2018, solely for the purposes of conducting the
25 deposition of Union Pacific's corporate representative pursuant to Federal Rule of Civil
26 Procedure 30(b)(6).

27 Due to numerous scheduling conflicts, Union Pacific is unable to produce a corporate
28 representative on or before June 18, 2018. The parties are meeting and conferring in good faith
29 to obtain a mutually convenient date, time, and location and have agreed that the deposition will
30 go forward no later than July 18, 2018.

31 STIP & [PROPOSED] ORDER FOR EXTENSION OF TIME TO TAKE
32 THE DEP OF UPRC'S CORPORATE REP - 1
33 CASE NO. 2:17-CV-00537-JLR

34 LANE POWELL PC
35 1420 FIFTH AVENUE, SUITE 4200
36 P.O. BOX 91302
37 SEATTLE, WA 98111-9402
38 206.223.7000 FAX: 206.223.7107

1 Union Pacific notified all defendants of this stipulation and proposed order with no
2 objections.

3 DATED this 13th day of June 2018.

4 LANE POWELL PC

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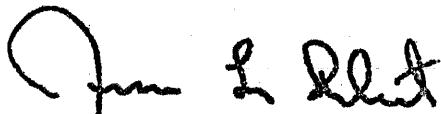
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25 STIP & [PROPOSED] ORDER FOR EXTENSION OF TIME TO TAKE
26 THE DEP OF UPRC'S CORPORATE REP - 2
27 CASE NO. 2:17-CV-00537-JLR

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1
2 **[PROPOSED] ORDER**

3 Based on the foregoing Stipulation, it is hereby ORDERED that the discovery deadline
4 for the deposition of Union Pacific's corporate representative may be extended to July 18, 2018.

5 DATED this 14th day of June 2018.



No other
deadlines
shall be
extended.

6 THE HONORABLE JAMES L. ROBART
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STIP & [PROPOSED] ORDER FOR EXTENSION OF TIME TO TAKE
THE DEP OF UPRC'S CORPORATE REP - 3
CASE NO. 2:17-CV-00537-JLR

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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the State of Washington, that on the 3rd day of June 2018, the document attached hereto was presented to the Clerk of the Court for filing and uploading to the CM/ECF system. In accordance with their ECF registration agreement and the Court's rules, the Clerk of the Court will send e-mail notification of such filing to the following persons:

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**STIP & [PROPOSED] ORDER FOR EXTENSION OF TIME TO TAKE
THE DEP OF UPRC'S CORPORATE REP - 4
CASE NO. 2:17-CV-00537-JLR**

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14 and I hereby certify that I have mailed by United States Postal Service the document to the
15 following non-CM/ECF participants:

16 Executed on the 13th day of June 2018.

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20 
Sabrina Mitchell

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27 STIP & [PROPOSED] ORDER FOR EXTENSION OF TIME TO TAKE
THE DEP OF UPRC'S CORPORATE REP - 5
CASE NO. 2:17-CV-00537-JLR

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